

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

C.A. No. 3:23-cv-30115-MGM

MIGUEL SANCHEZ MALDONADO, on
behalf of himself and all others similarly
situated

Plaintiff,

v.

SOUND SEAL INC.,

Defendant.

**ASSENTED-TO MOTION FOR ENLARGEMENT OF TIME TO FILE AN
ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT**

Defendant Sound Seal Inc. ("Sound Seal") hereby moves, pursuant to Fed. R. Civ. P. 6(b), this Court for an extension of time up to and including February 12, 2024, to answer, move, or otherwise respond to the complaint. As grounds for this motion, Defendant states as follows:

1. Plaintiff filed the complaint in this matter on October 27, 2023.
2. Plaintiff sent Sound Seal a Waiver of Service of Summons on November 13, 2023. Sound Seal has agreed to waive service of summons under Fed. R. Civ. P. 4(d), and therefore is required to respond to the complaint by January 12, 2024.
3. The parties have conferred and agree that providing Sound Seal an additional thirty days to respond would serve the interests of the parties because the parties are discussing a voluntary exchange of information regarding the allegations in the complaint. The parties would like to have time to continue these discussions and potentially resolve Plaintiff's claims.
4. This is the first request for an extension of time in this matter by either party.

WHEREFORE, the parties request that the Court grant this assented-to motion and extend the date for Sound Seal to respond to the complaint until February 12, 2024.

Assented to by:

MIGUEL SANCHEZ MALAONADO, on
behalf of himself and all others similarly
situated,
By his attorney,

/s/ Raymond Dinsmore
Raymond Dinsmore (BBO #667340)
Hayber, McKenna & Dinsmore, LLC
One Monarch Place, Suite 1340
Springfield, MA 01144
rdinsmore@hayberlawfirm.com

SOUND SEAL INC.
By its attorneys,

/s/ Kurt B. Fliegauf
Kurt B. Fliegauf (BBO #564329)
Brendan P. Kelley (BBO #689071)
CONN KAVANAUGH ROSENTHAL
PEISCH & FORD, LLP
One Federal Street, 15th Floor
Boston, MA 02110
kfliegauf@connkavanaugh.com
bkelley@connkavanaugh.com

Courtney J. Peterson (*pro hac* to be filed)
Bryan Cave Leighton Paisner LLP
1290 Avenue of the Americas
New York, NY 10104
Courtney.peterson@bclplaw.com

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule 7.1(a)(2), the undersigned conferred with counsel for Plaintiff and Plaintiff assents to this motion.

/s/ Brendan P. Kelley
Brendan P. Kelley

CERTIFICATE OF SERVICE

I hereby certify that on December 11, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filings to all parties who have appeared and registered with CM/ECF.

/s/ Brendan P. Kelley
Brendan P. Kelley

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MIGUEL SANCHEZ MALDONADO, on
behalf of himself and all others similarly
situated

Plaintiff,

V.

SOUND SEAL INC.,

Defendant.

**[PROPOSED] ORDER FOR AN ENLARGEMENT OF TIME FOR
DEFENDANT SOUND SEAL INC. TO RESPOND TO THE COMPLAINT**

Upon consideration of the submitted motion, the Court hereby grants the Assented-To Motion for an Enlargement of Time to File an Answer or Otherwise Respond to Plaintiff's Complaint, and **ORDERS** that the deadline for Sound Seal Inc. to answer, move, or otherwise respond to the complaint shall be February 12, 2024.

Dated: _____

Hon. Mark G. Mastroianni